

1 RICHARD C. BENNETT, ESQ. (State Bar No. 60561)  
ANDREW JOHNSON, ESQ. (State Bar No. 282082)

2 **BENNETT & JOHNSON, LLP**

3 1901 Harrison Street, Suite 1600

Oakland, California 94612

4 Telephone: (510) 444-5020

Facsimile: (510) 835-4260

*andrew@bennettjohnsonlaw.com*

5 Attorneys for Plaintiff

6 IVANA SALTELLI

7  
8 UNITED STATES DISTRICT COURT  
9 NORTHERN DISTRICT OF CALIFORNIA  
10

11  
12 IVANA SALTELLI,

13 Plaintiff,

14 vs.  
15

16 SAN FRANCISCO MARITIME  
NATIONAL HISTORICAL PARK;  
17 SAN FRANCISCO MARITIME MUSEUM;  
and DOES 1 through 50, inclusive,

18 Defendants,  
19

CASE NO.: 4:20-CV-06136-DMR

**REQUEST TO ENTER DEFAULT**

20 Plaintiff IVANA SALTELLI, hereby submits this Request to the Clerk of the above-  
21 entitled Court:

22 Pursuant to Rule 55(a) of the Federal Rules of Civil Procedure, Plaintiff IVANA  
23 SALTELLI, hereby requests that the Clerk of this Court enter a default in this matter against  
24 Defendants SAN FRANCISCO MARITIME NATIONAL HISTORY PARK, and SAN  
25 FRANCISCO MARITIME MUSEUM on the grounds that said Defendants have failed to appear  
26 or otherwise respond to the Complaint within the prescribed Rules of Federal Civil Procedure.  
27  
28

1 This Complaint was served on both Defendants on October 26, 2020, during the COVID  
2 shutdown. Service was completed at the National Historical Park Headquarters due to the fact  
3 that the San Francisco Federal Building was shut down for COVID concerns. The National  
4 Historical Park Headquarters (2 Marina Blvd., building E, 2<sup>nd</sup> Floor, San Francisco) was also  
5 where the Department of the Interior advised Plaintiff service could be completed.

6 On October 27, 2020 the Department of the Interior confirmed by email that “the park”  
7 had received Plaintiff’s Complaint.

8 The address where service was performed is the address listed online as the San Francisco  
9 Maritime National Historical Park Headquarters.

10 According to Rule 12(a)(2) of the Federal Rules of Civil Procedure the deadline for  
11 Defendants SAN FRANCISCO MARITIME NATIONAL HISTORY PARK, and SAN  
12 FRANCISCO MARITIME MUSEUM to respond has passed. The proofs of service related to  
13 each Defendant were filed with this Court on November 13, 2020.

14 Defendants’ responsive Pleadings were due on December 25, 2020 but no responses have  
15 ever been provided. Plaintiff respectfully request that Default be entered against both Defendants.

16  
17 DATED: February 24, 2021

Respectfully submitted,

18  
19 BENNETT & JOHNSON, LLP

20  
21 By:                     /s/                      
22 ANDREW L. JOHNSON  
23 Attorneys for the Plaintiff  
24  
25  
26  
27  
28